

### REMARKS

This Amendment is responsive to the Office Action mailed August 30, 2005 (hereinafter "Office Action"). In response to the rejections based on U.S. Patent No. 6,291,335 to Schnabel et al. (hereinafter "Schnabel"), Applicants have amended independent Claim 1 to include recitations along the lines of Claim 3, such that Claim 1 now recites "an insulating film disposed between a sidewall of the conductive plug and sidewalls of the conductive pattern and the second insulation layer." Independent Claim 16 has been similarly amended to include recitations along the lines of Claim 18, and now recites "respective insulating films disposed between respective sidewalls of the conductive plug and sidewalls of the bit lines and the second insulation layer." Applicants have canceled Claims 3 and 18, and have amended dependent Claims 4, 9, 13, 20 and 23 in concert with the amendments to independent Claims 1 and 16.

The Office Action alleges that Claims 3 and 18, which include recitations relating to insulating films, are anticipated by Schnabel. Office Action, p. 2. However, Applicants note that the Office Action fails to provide any specific indication as to where Schnabel discloses or suggests such recitations. Applicants submit that Schnabel is devoid of such teachings and, therefore, Schnabel fails to disclose or suggest the recitations of Claims 3 and 18 and, for similar reasons, the recitations of amended Claims 1 and 16. In particular, the structures shown in Figs. 3-11 of Schnabel clearly do not include, among other things, insulating films as recited in amended Claims 1 and 16. For at least these reasons, Applicants submit that amended Claims 1 and 16 are patentable.

Applicants submit that dependent Claims 2, 4-15, 17 and 19-25 are patentable at least by virtue of the patentability of the various ones of independent Claims 1 and 16 from which they depend. Applicants further submit that several of these dependent claims are separately patentable. For example, Claims 4 and 5 recite specific composition and thicknesses of insulating films, respectively. In rejecting these claims as obvious over a combination of Schnabel, U.S. Patent No. 5,856,704 to Schuele (hereinafter "Schuele") and U.S. Patent Application Publication No. 2002/0025689 to Yang et al. (hereinafter "Yang"), the Office Action provides no indication as to where Schnabel, Schuele or Yang allegedly teach such

configurations of insulating films. For at least these reasons, Applicants submit that Claims 4 and 5 are separately patentable.

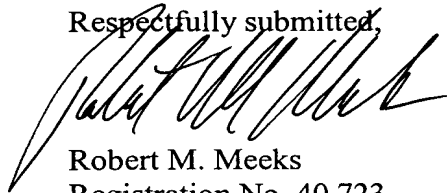
Amended Claims 9 and 20 recite specific relationships between glue layers and insulating film. As with Claims 4 and 5, the Office Action fails to provide any specific indication as to where the cited combination of Schnabel, Schuele and Yang disclose or suggest the recitations of Claims 9 and 20. None of these references appear to disclose the relationships recited Claims 9 and 20 as amended herein. For at least these reasons, Applicants submit that amended Claims 9 and 20 are separately patentable.

Amended Claims 13 and 23 include specific recitations relating to the extent of insulating films, i.e., "wherein the conductive plug and the insulating film extend through the second and third insulation layers" and "wherein the conductive plug and the insulating films extend through the second and third insulation layer." None of the cited references disclose or suggest such relationships between insulating films and insulation layers. For at least these reasons, Applicants submit that Claims 13 and 23 are separately patentable.

### **Conclusion**

Applicants respectfully submit that Claims 1-25 are in condition for allowance for at least the reasons discussed above. Applicants, therefore, request allowance of the claims and passing of the application to issue in due course. Applicants encourage the Examiner to contact the undersigned by telephone to resolve any outstanding issues.

Respectfully submitted,



Robert M. Meeks  
Registration No. 40,723  
Attorney for Applicant(s)

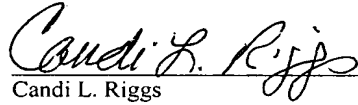
**USPTO Customer No. 20792**  
Myers Bigel Sibley & Sajovec  
Post Office Box 37428  
Raleigh, North Carolina 27627  
Telephone: 919/854-1400  
Facsimile: 919/854-1401

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**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on November 22, 2005.

  
Candi L. Riggs

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